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SOUTHER	N	DISTF	RICT	OF	NEW	YORK

UNITED STATES OF AMERICA

INDICTMENT

18 Cr.

SHMUEL ZARZAR,

18 CRIM 177

Defendant.

COUNT ONE

The Grand Jury charges:

From at least in or about December 2017, up to and including at least in or about February 2018, in the Southern District of New York and elsewhere, SHMUEL ZARZAR, the defendant, willfully and knowingly, attempted to use a facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged with a criminal offense, to wit, ZARZAR used a cellphone and phone messaging application to attempt to persuade, induce, entice, and coerce a minor to engage in sexual

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activity and attempted to meet with the minor in New York, New York to engage in sexual activity, in violation of New York

Penal Code Sections 130.60(2) and 130.65(4).

(Title 18, United States Code, Sections 2422 and 2.)

FOREPERSON

GEOFFREY SUBER

United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SHMUEL ZARZAR,

Defendant.

INDICTMENT

18 Cr.

(18 U.S.C. §§ 2422 and 2.)

GEOFFREY S. BERMAN

United States Attorney

Andictment filed, core visigned to prolze Ferman.